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January 4, 2023

**VIA ECF**

Hon. J. Paul Oetken  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: United States v. Noel Sanabria, 21-cr-313 (JPO)**

Dear Judge Oetken:

I am CJA counsel to Noel Sanabria. I write to respectfully request a one-time modification to Mr. Sanabria's bail conditions to permit him to be attend his brother's funeral and burial on January 7, 2023 in both the Bronx and New Jersey.

Pre-Trial Services Officer Viosanny Harrison has indicated that Pre-Trial has no objection to this request and the government has informed the defense that it defers to Pre-Trial Services.

Mr. Sanabria is currently on pre-trial release on the following terms and conditions (among others not relevant to the instant application):

\$200,000 personal recognizance bond signed by two FRPs;  
secured by \$100,000 cash/property; travel restricted to the  
SDNY and EDNY; surrender of travel documents and no  
new applications; pretrial supervision as directed by pretrial  
services; and home detention with location monitoring.

ECF #15. Mr. Sanabria has been fully complaint with the terms of his release.

He respectfully requests that he be permitted to leave his home on January 7, 2023 at 8am and return by 11pm so that he may attend the funeral at St. John's Chrysostom church in the Bronx and the burial at the Maple Grove Park Cemetery in Hackensack, New Jersey. The family will then be gathering at a relative's house back in the Bronx.

As noted, Pre-Trial Services has no objection to this request and the government defers to Pre-Trial Services.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

/s/

David S. Greenfield

cc: All Parties (via ECF)  
Pre-Trial Services Officer Viosanny Harrison (via email)

Granted.  
So ordered.  
January 5, 2023

  
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J. PAUL OETKEN  
United States District Judge